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Attorneys for Defendants JPMORGAN CHASE BANK, N.A.; CALIFORNIA
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

EMIL P. MILYAKOV;
MAGDALENA A. APOSTOLOVA

Plaintiffs,

v.

JP MORGAN CHASE, N.A.; HSBC BANK
USA, NA; CALIFORNIA
RECONVEYANCE CO.; PAUL
FINANCIAL, LLC; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC (MERS); FOUNDATION
CONVEYANCING, LLC; AND DOES 1
THROUGH 100,

Defendants.

Case No. 11-cv-2066-EDL

**STIPULATION REGARDING
DEADLINE TO FILE RESPONSIVE
PLEADING; ~~PROPOSED~~ ORDER**

[CIVIL L.R. 6-2]

Judge: Honorable Elizabeth D. Laporte

STIPULATION

Plaintiffs Emil P. Milyakov and Magdalena A. Apostolova and Defendants JPMorgan Chase Bank, N.A., California Reconveyance Co., and Mortgage Electronic Registration Systems, Inc. (collectively "the parties"), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS,

1. Defendants' responsive pleading is due May 16, 2011.
2. The parties are engaged in discussions to resolve this matter amicably.
3. The parties have requested no previous extension of time and the extension requested herein is not requested for the purposes of delay and will not result in prejudice to the parties or the Court.
4. A trustee's sale of the property located at 106 Madrid Street, San Francisco, California, which is the subject of this action, is currently scheduled for July 6, 2011.

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NOW, THEREFORE

1. Defendants shall file a responsive pleading on or before July 19, 2011.
2. Defendants shall postpone the trustee's sale if the parties have not reached an amicable resolution before July 6, 2011.

IT IS SO STIPULATED.

The content of this document is acceptable to all persons who have signed below.

Dated: May 16, 2011

Ganka Hadjipetrova

By: /s/ Ganka Hadjipetrova

Ganka Hadjipetrova

Attorney for Plaintiffs EMIL P. MILYAKOV
AND MAGDALENA A. APOSTOLOVA

Dated: May 16, 2011

BRYAN CAVE LLP

By: /s/ Robert J. Esposito

Robert J. Esposito

Deborah Goldfarb

Glenn Plattner

Attorneys for Defendants
JPMORGAN CHASE BANK, N.A.;
CALIFORNIA RECONVEYANCE CO.; and
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.

[PROPOSED] ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

May 18, 2011
Date

Honorable Elizabeth D. Laporte
United States District Court
Northern District of California

